



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
v. :
DAVID MORRISON, :
Defendant. :
:

INDICTMENT

The Grand Jury for the District of Delaware charges that:

DEFINITION

For purposes of this Indictment, the term "child pornography" is defined in Title 18, United States Code, Section 2256(8), and means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct. The term "sexually explicit conduct" is defined in Title 18, United States Code, Section 2256(2)(A), and includes but is not limited to: sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; masturbation; and graphic or simulated lascivious exhibition of the anus, genitals, or pubic area of any person. Moreover, the term "visual depiction" is defined in Title 18, United States code, Section 2256(5), and includes but is not limited to data stored on computer disk or by electronic means which is capable of conversion into a visual image, and data which is capable of

conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format. Finally, the term “minor” is defined in Title 18, United States Code, Section 2256(1), as any person under the age of eighteen years.

COUNT ONE

(Transportation of Child Pornography)

On or about July 20, 2023, in the District of Delaware and elsewhere, the defendant, **DAVID MORRISON**, did knowingly transport any child pornography, using any means or facility of interstate or foreign commerce, and that was shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, and did attempt to do so, in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT TWO

(Receipt of Child Pornography)

On or about July 28, 2023, in the District of Delaware, the defendant, **DAVID MORRISON**, did knowingly receive any child pornography, using any means or facility of interstate or foreign commerce, and that was shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, and did attempt to do so, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT THREE

(Possession of Child Pornography)

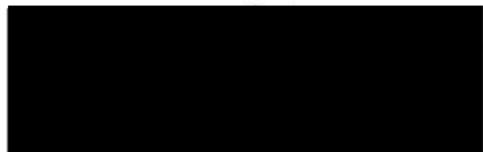
Between on or about July 20, 2023 and August 1, 2023, in the District of Delaware, the defendant, **DAVID MORRISON**, did knowingly possess material that contained an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce, and in or affecting interstate or foreign commerce by any means,

including by computer, and that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

NOTICE OF FORFEITURE

Upon conviction for violating Title 18, United States Code, Section 2252A, as set forth in Counts One through Three of the Indictment, the defendant, **DAVID MORRISON**, shall forfeit to the United States any and all matter that contains visual depictions of child pornography or visual depictions that are obscene or that are or appear to be of minors engaged in sexually explicit conduct, that are produced, transported, shipped, received or possessed in violation thereof; any property constituting or derived from any proceeds **DAVID MORRISON** obtained directly or indirectly as a result of the aforementioned violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:



DAVID C. WEISS
UNITED STATES ATTORNEY

By:


Briana Knox
Assistant United States Attorney

Dated: [insert date] Sept. 5, 2023